

MCI Cross Ex. 1 (Panfil)
Docket No. 02-0864
Admitted 3/15/04

ICC Docket No. 02-0864
Illinois Commerce Commission
AT&T Communications, Inc.
Data Request No. JG-3

Request: Please produce a copy of all documents or other materials provided to the ICC Staff (that is, in addition to any copies of SBC's responses to Staff data requests that SBC has provided to AT&T) in conjunction with Advice Nos. 02-607, 02-1528 and 02-1637 as well as Docket No. 02-0864.

Response: Note that Advice No. 02-1637 involves the proposed UNE rates that are the subject of Docket 02-0864. In addition to the documents and materials that have already been provided to AT&T in this case, SBC Illinois provided Staff with the following files in conjunction with Advice No. 02-1637, copies of which are attached:

(AT&T JG-3) 02-1637 Rev Eff for Filing Pkg (confidential) .xls
(AT&T JG-3) 02-1637 ImpNAL11 Dec (confidential).xls
(AT&T JG-3) 02-1637 UNE-bkg-12-24 (confidential).DOC

Note that the imputation test included in file (AT&T JG-3) 02-1637 ImpNAL11 Dec (confidential).xls, above, has previously been provided to AT&T as a preliminary response to JG-3.

SBC Illinois objects to this request to the extent that it requests documents and materials provided in conjunction with Advice Nos. 02-607 and 02-1528, both of which were withdrawn, on the grounds that such request is overbroad and not reasonably calculated to lead to the discovery of relevant evidence in this docket. SBC particularly objects to the request on these grounds to the extent that it calls for the production of documents and materials relating to rates for UNEs and services that were part of the filing under Advice 02-607 but which are not a subject of Advice 02-1637 and, consequently, not a subject of this docket.

Notwithstanding and without waiving these objections, SBC Illinois hereby provides the attached confidential files. The attached confidential files contain all materials and documents responsive to the request as it relates to Advice No. 02-1528 and well as certain files relating to Advice No. 02-607, one of which has been redacted to exclude demand data for rates which are not a subject of Advice 02-1637:

(AT&T JG-3) 02-1528 EEL-bkg (confidential) .DOC
(AT&T JG-3) 02-1528 EEL_N WhslUNE_IL 03-06_ (confidential).xls
(AT&T JG-3) 02-1528 SA2UNE CONVERSION_N_ whslUNE_IL 02-05
(confidential).xls

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(AT&T JG-3) 02-1528 Serv Ord EEL_N_Whsl_IL_03-06 (confidential).xls
(AT&T JG-3) 02-1528 SrvOrd SP ACC to UNE AdminChgPerReq_N_WhslUNE_IL_02-05 (confidential).xls

(AT&T JG-3) 02-607 ImpNAL11 Sep (confidential).xls
(AT&T JG-3) 02-607 Rev Eff for Filing Pkg (redacted)(confidential) .xls
(AT&T JG-3) 02-607 UNE-bkg (confidential) .DOC

In addition, cost Support files for Advice No. 02-607, which are too voluminous for email, are being provided on a CD under separate cover. The files for Advice No. 02-607 have been redacted to exclude material for cost studies and cost models which are not related to the UNE costs and rates that are the subject of this proceeding.

Witness Responsible: Eric Panfil
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